

Exhibit A**Horizon Global Americas Inc.'s Interpretations of Claim Terms
Identified for Construction by Curt Manufacturing, LLC****CONSTRUCTION OF CLAIM 1 OF U.S. PATENT NUMBER 6,068,352**

Phrase	Horizon Proposed Interpretation	Curt Proposed Interpretation	Court's Interpretation	
1	a current sensing circuit	No construction necessary. Alternatively, a circuit that senses the level of braking current supplied to the brakes of the towed vehicle through the power circuit.		
2	controlling one or more of said indicator lights to indicate that the towed vehicle brakes are or are not properly connected to said power switching circuit	No construction necessary. Alternatively, the microcontroller controls a light that displays a connection error between the power switching circuit in the brake controller and the trailer brakes.		

CONSTRUCTION OF CLAIM 1 OF U.S. PATENT NUMBER 8,179,142

Phrase	Horizon Proposed Interpretation	Curt Proposed Interpretation	Court's Interpretation
1 microcontroller	No construction necessary.		
2 a current sensing device connected to said microcontroller to monitor current flow at said loads	No construction necessary. Alternatively, a circuit connected to the microcontroller that senses current flowing to the trailer lamp light loads.		

CONSTRUCTION OF CLAIM 31 OF U.S. PATENT NUMBER 8,179,142

Phrase	Horizon Proposed Interpretation	Curt Proposed Interpretation	Court's Interpretation
1 microcontroller	No construction necessary.		
2 wherein said input signal from said first vehicle contains information related to two or more parameters of said first vehicle	No construction necessary. Alternatively, the signal coming from the vehicle includes information relating to two or more different qualities.		
3 wherein said microcontroller is capable of decoding said input signal and outputting a signal to said second vehicle related to at least one of said two or more parameters of said first vehicle	No construction necessary. Alternatively, the microcontroller can decode at least one of the parameters from the input signal, and can output a signal to the trailer.		

CONSTRUCTION OF CLAIMS 1 AND 4 OF U.S. PATENT NUMBER 9,592,863

Phrase	Horizon Proposed Interpretation	Curt Proposed Interpretation	Court's Interpretation	
1	a beam engaged with said cross-member about a first axis	No construction necessary. Alternatively, a support connected to a cross-member on a first axis.		
2	cross-member isolator dampens longitudinal displacement	No construction necessary. Alternatively, an object that reduces forward and backward movement of the support in the first axis.		
3	isolator	“Isolator” does not appear alone in claims 1 or 4. It only appears in the “cross-member isolator” and “wing isolator” terms for which Curt separately seeks construction. No further construction is necessary.		
4	wing isolator	No construction necessary. Alternatively, an object between the beam and skid plate that reduces the rotational movement on a second axis.		

CONSTRUCTION OF CLAIMS 1 AND 4 OF U.S. PATENT NUMBER 9,522,583

Phrase	Horizon Proposed Interpretation	Curt Proposed Interpretation	Court's Interpretation
1	a locking member extending through the body member and being axially moveable relative to the body member	No construction necessary. Alternatively, a part that moves up and down through the body member to lock it.	
2	first . . . axial position[]	No construction necessary. Alternatively, a first vertical position.	
3	second . . . axial position[]	No construction necessary. Alternatively, a second vertical position that is different than the first vertical position.	

CONSTRUCTION OF CLAIMS 1 AND 4 OF U.S. PATENT NUMBER 9,248,713

	Phrase	Horizon Proposed Interpretation	Curt Proposed Interpretation	Court's Interpretation
1	A safety chain engaging device for a towing vehicle having a gooseneck hitch attached	The preamble is not limiting and no further construction is necessary. Alternatively, a device for engaging a safety chain when installed on a vehicle having a gooseneck hitch attached.		